

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ  
RICHARD F. ALBERT  
ROBERT J. ANELLO\*  
KATHLEEN E. CASSIDY  
BENJAMIN S. FISCHER  
CATHERINE M. FOTI  
CHRISTOPHER B. HARWOOD  
LAWRENCE IASON  
BRIAN A. JACOBS  
TELEMACHUS P. KASULIS  
KAREN R. KING  
ROBERT M. RADICK\*  
JONATHAN S. SACK\*\*  
EDWARD M. SPIRO  
JEREMY H. TEMKIN  
RICHARD D. WEINBERG

565 FIFTH AVENUE  
NEW YORK, NEW YORK 10017  
(212) 856-9600  
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

kcassidy@maglaw.com  
(212) 880-9413

SENIOR COUNSEL  
PAUL R. GRAND

COUNSEL  
JASMINE JUTEAU  
CURTIS B. LEITNER

ROBERT G. MORVILLO  
1938-2011

MICHAEL C. SILBERBERG  
1940-2002

JOHN J. TIGUE, JR.  
1939-2009

\*ALSO ADMITTED IN WASHINGTON, D.C.

\*\*ALSO ADMITTED IN CONNECTICUT

November 23, 2021

**By ECF**

The Hon. Andrew E. Krause  
United States Magistrate Judge  
Southern District of New York  
United States Federal Building & Courthouse  
300 Quarropas St.  
White Plains, NY 10601

Re: United States v. Mirabal, Case No. 21mj10449

Dear Judge Krause:

We represent Mr. Mirabal, defendant in the above-captioned case, for bail purposes. I write to request approval from the Court for a one-day modification to Mr. Mirabal's bail conditions to allow him to attend a Thanksgiving dinner with his family at his aunt's house, which is also located in the Southern District of New York.

Since his release, Mr. Mirabal has been subject to home detention with electronic monitoring at his parents' home in Rockland County, and he must obtain pre-approval for any travel outside of his home from the United States Pretrial Services Agency ("Pretrial"). Pretrial has confirmed that Mr. Mirabal has been fully compliant with all conditions of his release. Mr. Mirabal's travel with permission is restricted to the Southern and Eastern Districts of New York as well as the District of New Jersey. His aunt's home, where he will travel if granted permission, is in Dutchess County in the Southern District of New York, about an hour and a half from his home.

If allowed to attend, Mr. Mirabal would travel to and from Thanksgiving dinner by car on Thursday, November 25, with both of his parents, and return before midnight. As noted, Mr. Mirabal is subject to 24-hour electronic monitoring. At no point would Mr. Mirabal be unaccompanied.

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Per my conversation with AUSA Ben Klein, the Government takes no position on this request. Pretrial has informed me that their policy is to object to social leave requests for individuals on home detention and that any such requests must be approved by the Court.

We would have submitted this request to the Court earlier, but until today we were laboring under the impression that Pretrial would be able to grant Mr. Mirabal permission to attend Thanksgiving without the need for Court intervention. Upon learning today that Court permission was necessary, we immediately wrote this letter to the Court.

We respectfully request that, by "so ordering" this letter, the Court approve the one-day, temporary bail modification set forth above and authorize the above-mentioned trip to Dutchess County for Thanksgiving. Pretrial has been provided with the specific address. We thank the Court for its attention to this matter and wish the Court and its personnel a happy Thanksgiving.

Respectfully submitted,

/s/

Kathleen E. Cassidy

cc: Ben Klein, Assistant U.S. Attorney (by ECF)  
Leo Barrios, Pretrial Services (by email)

**APPLICATION GRANTED**



**Hon. Andrew Krause, U.S.M.J.**

11/23/21